

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

RAMIRO MENDOZA

Case No. **1:25-MJ-00011***Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 8, 2025 in the county of Butler in the
Southern District of Ohio, the defendant(s) violated:

*Code Section*Title 21 U.S.C. § 846*Offense Description*

Conspiracy to Possess with Intent to Distribute +500g of Methamphetamine Mixture

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.*James L. Whitehouse**Complainant's signature*

James Whitehouse, Task Force Officer

*Printed name and title*Received be reliable electronic means and
sworn and attested to by telephone.Date: Jan 8, 2025*Stephanie K. Bowman**Judge's signature*City and state: Cincinnati, Ohio

Stephanie K. Bowman, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA

v.

RAMIRO MENDOZA

Case No. 1:25-MJ-00011

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, James L. Whitehouse, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Detective with the West Chester Police Department located in Butler County, Ohio. I have been employed at the West Chester Police Department since April 1997. I am currently assigned as a Task Force Officer with the U.S. Drug Enforcement Administration (DEA) since August of 2003. I have received extensive training in the investigation of offenses involving controlled substances. I am assigned to the DEA Cincinnati resident office, working on complex conspiracy investigations. I have participated in multiple investigations. I have had the opportunity to interview drug traffickers and have become familiar with the various techniques employed by these subjects to use, distribute, and transport narcotics.

2. The Attorney General of the United States has empowered me with Title 21 Authority, which authorizes me to seize property, conduct search warrants, and make arrests of persons for violations of the Controlled Substances Act. This affidavit is made in support of a complaint against Ramiro MENDOZA for attempting and conspiring to possess with intent to distribute methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States

Code, Sections 846 and 841(b)(1)(A). This affidavit is being submitted for the limited purpose of establishing probable cause authorizing the arrest of Ramiro MENDOZA. I have not included each and every fact and circumstance of which I am aware. I have set forth only those facts which I believe are necessary to establish probable cause.

3. The facts set forth in this complaint are based on personal knowledge derived from my participation in this investigation and upon information presented to me by other law enforcement officers involved in this case to include fellow Drug Enforcement Administration (DEA) special agents, DEA task force officers, Bureau of Alcohol, Tobacco, and Firearms agents, West Chester Police Department (WCPD) detectives and Cincinnati Police Department (CPD) officers. The sources of my information and beliefs include:

- a. Oral and written reports about this investigation which I have received from, CPD, WCPD and which ATF have been reported to me either directly or indirectly;
- b. Physical surveillance by Special Agents of the DEA, the WCPD, ATF, CPD which have been reported to me either directly or indirectly.

PROBABLE CAUSE

4. On January 6, 2025, DEA Cincinnati, ATF Cincinnati, and West Chester Police Department (collectively, “Agents” and/or “law enforcement”) were made aware of suspicious freight currently located at ABF Freight, 6290 Allen Road, West Chester, Ohio. ABF Freight received a shipment of ten pallets of paving rocks on December 16, 2024, from a secondary logistics company that was previously picked up at a storage facility in Humble, Texas. The final destination address of the shipment was listed as 3131 – 3151 S. Veruty Pkwy (believed to be Verity), Middletown, Ohio 45044 to a Roberto Jimenez with phone number [REDACTED] 2110.

5. Prior to law enforcement involvement, ABF Freight attempted to deliver the suspicious freight on December 27, 2024. ABF Freight dispatchers and delivery drivers had contact with a male Hispanic on the [REDACTED]-2110 phone number. The male Hispanic told the driver that he would meet him within the hour, however he did not arrive. ABF Freight then returned the freight to their facility on Allen Road.

6. On January 7, 2025, law enforcement responded to ABF Freight and inspected the suspicious pallets. A K9 was summoned to the scene and conducted a free air sniff of the pallets resulting in a positive alert for the presence of a narcotic odor.

7. On January 8, 2025, ABF Freight contacted the male Hispanic at [REDACTED]-2110 who agreed to take delivery of the pallets. ABF Freight then transported the pallets to the address range of 3131 – 3151 S. Verity Pkwy. Upon arrival, the ABF driver was contacted by a male Hispanic later determined to be Ramiro MENDOZA through his California issued driver's license. MENDOZA pulled a white box truck up to the ABF truck. The ABF driver then unloaded 7 of the pallets into the white box truck and the remaining 3 pallets onto a landscaping trailer being pulled by a white Ford truck driven by another individual. MENDOZA then entered the white box truck and attempted to depart the area when he was stopped by members of the Ohio State Highway Patrol. During a subsequent search, law enforcement found a phone with the [REDACTED]-2110 phone number in MENDOZA's possession.

8. The pallets were transported to the West Chester Police Department for further inspection. Law enforcement executed a state search warrant on the pallets and located at least one fake landscaping paver that contained PVC piping containing approximately 2 pounds of suspected crystal methamphetamine. A sample of the suspected crystal methamphetamine was field tested and yielded a positive result for the presence of methamphetamine.

CONCLUSION

9. Based on the facts and circumstances listed above, and on my training and experience, I have reason to believe, and do believe, that on or about January 8, 2025, in the Southern District of Ohio, Ramiro MENDOZA and others known and unknown conspired to possess with intent to distribute 500 grams or more of methamphetamine mixture, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

Respectfully submitted,

James L. Whitehouse

James L. Whitehouse
Task Force Officer
Drug Enforcement Administration

Subscribed and sworn to before me on January 8, 2025.

Stephanie K. Bowman



HON. STEPHANIE K. BOWMAN
UNITED STATES MAGISTRATE JUDGE